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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,

Plaintiffs,

v.

META PLATFORMS, INC.,

Defendant.

Case No. 20-cv-08570-JD

Hon. James Donato

**PROOF OF SERVICE OF DOCUMENTS
IN SUPPORT OF ADVERTISER
PLAINTIFFS' ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
CLEVELAND RESEARCH COMPANY,
LLC'S MATERIAL SHOULD BE SEALED**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States
3 District Court for the Northern District of California. I am a partner at Bathae Dunne LLP, counsel for
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth
5 herein and, if called as a witness, could and would testify competently to them.

6 2. On April 17, 2023, I served on nonparty Cleveland Research Company, LLC (“CRC”) a copy of (1) the Declaration of Brian J. Dunne in Support of Advertiser Plaintiffs’ Administrative
7 Motion to Consider Whether Cleveland Research Company, LLC’s Material Should Be Sealed, filed in
8 connection with the concurrently filed discovery dispute letter; and (2) a partially-unredacted version
9 of the discovery dispute letter, redacting information in the discovery dispute letter designated
10 “Confidential” or “Highly Confidential” by Defendant Meta Platforms, Inc., and nonparty Netflix, Inc.,
11 and highlighting in green those portions of the letter referencing or reflecting the contents of documents
12 and information designated by CRC as “Confidential” or “Highly Confidential” under the Stipulated
13 Protective Order (Dkt. No. 314).
14

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Executed on April 17, 2023, in Austin, Texas.

17 /s/ Brian J. Dunne
18 Brian J. Dunne
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